UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

Case No.: 1:21-cr-00371-BMC-TAM

AL MALIK ALSHAHHI, et al.

Defendants.

DEFENDANT THOMAS J. BARRACK, JR.'S MOTION TO RECONSIDER

The defendant Thomas J. Barrack, Jr. hereby joins defendant Matthew Grimes's motion to reconsider the defendants' motions to dismiss the indictment in light of the Supreme Court's decision in *Ruan v. United States*, No. 20-1410 (U.S. June 27, 2022).

Dated: New York, New York June 29, 2022

Respectfully submitted,

WILLKIE FARR & GALLAGHER LLP

Michael Steven Schachter Randall Wade Jackson Steven J. Ballew 787 Seventh Avenue New York, NY 10019-6099 Telephone: (212) 728-8000 Fascimile: (212) 728-8111

Email: mschachter@willkie.com rjackson@willkie.com sballew@willkie.com

O'MELVENY & MYERS LLP

/s/ Daniel M. Petrocelli

Daniel M. Petrocelli (admitted *pro hac vice*) 1999 Avenue of the Stars, 8th Floor Los Angeles, CA 90067 Telephone: (310) 553-6700 Facsimile: (310) 246-6779 E-mail: dpetrocelli@omm.com

James A. Bowman (admitted *pro hac vice*) 400 South Hope Street, 18th Floor

Los Angeles, CA 90071 Telephone: (213) 430-6000 Facsimile: (213) 430-6407 E-mail: jbowman@omm.com

Samantha Miller Times Square Tower 7 Times Square New York, New York 10036 Telephone: (212) 326-2000 Facsimile: (212) 326-2061

E-mail: samanthamiller@omm.com

Attorneys for Thomas Joseph Barrack, Jr.